September 26, 2024

Via E-Mail
Mr. Mark. Dziadosz
EGLE - Air Quality Division
Warren District Office
DziadoszM@Michigan.gov

RE: Tribar Technologies, Inc. - Plant 5 (P0727)
Response to the September 5, 2024 VN

Mr. Dziadosz:

This letter is in response to the Violation Notice sent to Tribar Technologies, Inc. Plant 5 (Tribar) dated September 5, 2024. The VN was issued in response to an inspection on July 29, 2024, by the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD). The purpose of the inspection was to determine Tribar's compliance with its applicable requirements under the federal Clean Air Act and state law, including Permit to Install (PTI) #121-16.

Based on the inspection and related record review, AQD staff noted the following:

Process Description	Rule/Permit Condition Violated	Comment
EUSYSTEM2	S.C III.2 **R336.1224, R 336.1225, R336.1910**	The permittee must maintain a surface tension of 35 dynes and under at any time during tank operation. Tank 5 & 6 exceeded this limit multiple times in the time frame checked.

Tribar understands that, based on AQD's review of PTI compliance records from 2023, the agency observed that some of the recorded lab test results suggested an exceedance of the applicable surface tension limit. In particular, Tribar understands that AQD is referring to discrete readings from July and October of 2023.

As Tribar explained during the July 29 site inspection, the company believes that it met the surface tension requirements in the tanks despite the lab data. To the extent that some sampling records reflect a slightly higher surface tension, Tribar believes that those slightly higher readings are a result of delays between the tank sample gathering and the tank sample testing.

Specifically, under prior practices, Tribar staff sometimes gathered a series of tank samples before transporting that set of samples to the lab for analysis. Further, there was previously no assurance that the first tank samples taken were the first samples analyzed in the lab. Thus, for the samples that were obtained early during such a "gathering period," there was time for the temperature to drop before the lab analysis took place.

Lower temperatures at the time of sample testing can lead to results that suggest a surface tension reading in excess of the permit limit. Effectively, as the sample cooled before testing, it became less and less representative of the conditions in the tank where it came from. Tribar believes that these slightly higher sample results were likely attributable to the *past* delays between the sample gathering and confirmatory lab testing.

As of November 13, 2023, Tribar has maintained "DST 60 Tensiometer Surface Tensions" instructions to ensure that the sample temperature remains within tank parameters during the surface tension test. This helps ensure that a representative sample is tested in the lab, rather than one that has "waited" for confirmatory lab testing and become less representative. Since these improved sampling and testing instructions were implemented, Tribar has maintained consistent compliance with the surface tension requirements.

In addition, if any dynes reading is detected over the federal limit, Tribar's internal systems now send a notification to management to investigate immediately. Thus, even though the improved sampling and testing instructions appear to have address the issue (i.e., given the consistent surface tension compliance since November 2023), Tribar also has a safety net in place to spur a timely response to any future deviations or potential deviations.

I believe that this letter addresses AQD's concerns in the September 5, 2024 VN, but please do not hesitate to contact Alex Muench or Jack Gifford with any questions.

Sincerely,

Jon Gifford
COO and President

C: Alex Muench, Tribar EHS
Jack Gifford, Tribar EHS
Teresa Kinder, Barr
Scott Venman, Barr
Kurt Kissling, Warner